

WRIGHT, FINLAY & ZAK, LLP

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SALMA AGHA-KHAN, MD., an individual,

Plaintiff,

vs.

Case No.: 2:16-cv-02928-APG-PAL

**RENEWED MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT**

WELLS FARGO BANK, NA, A US Bank;
WELLS FARGO FINANCIAL NATIONAL
BANK, A National Banking Association;
WELLS FARGO HOME MORTGAGE, a
Wells Fargo Bank, NA subsidiary;
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., a
Delaware agency/corporation, form unknown;
MERSCORP HOLDINGS INC., holding/parent
company of MERS Inc.; TBI MORTGAGE
COMPANY, a mortgage company; GMAC
MORTGAGE, LLC FKA GMAC
MORTGAGE CORPORATION, a financial
lending business; OCWEN FINANCIAL
CORPORATION, a financial concern, form
unknown; MARIN CONVEYANCING CORP
AKA MARIN CONVEYANCING
CORPORATION, a lending corporation form
unknown; EXECUTIVE TRUSTEE
SERVICES, LLC, a defunct Delaware company
form unknown; FIRST AMERICAN TITLE
COMPANY, a title agency form unknown;
FIRST AMERICAN TITLE INSURANCE
COMPANY, a title insurance company form
unknown; ROUTH CRABTREE OLSEN PS, a
law firm in California; EDWARD T. WEBER,
an individual and attorney at Routh Crabtree
Olsen PS; BRET P. RYAN, an individual and
attorney at Routh Crabtree Olsen PS;
JOHNATHAN J. DAMEN, an Individual and
attorney at Routh Crabtree Olden PS; JEFF
ROMIS AKA JEFFREY L. ROMIG, an
individual; PATRICIA J. KRAUSE, an

individual; GREENPOINT MORTGAGE
FUNDING, INC., a mortgage company form
unknown; SERVICELINK AKA
SERVICELINK, LLC a business organization
form unknown; LSI TITLE AGENCY INC., a
title agency form unknown; CHICAGO TITLE
COMPANY, a title company form unknown;
FIDELITY NATIONAL DEFAULT
SOLUTIONS, INC., a company form
unknown; NATIONWIDE TITLE CLEARING,
a title company form unknown; AMANDA
ROSE JONES, an individual and Assistant
Secretary for MERS Inc., KRISTOPHER
JAMES SANDBERG, a Wells Fargo employee;
and DOES 1 THROUGH 1000, INCLUSIVE,

Defendants.

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants, OCWEN FINANCIAL CORP.,
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., MERSCORP HOLDINGS INC.
hereby request an order granting additional time, up to and including April 1, 2017, to file a responsive
pleading to Plaintiff's pro per Complaint. Defendants have retained new counsel for joint defense of this
action, and are diligently working to complete the transition process. This is Defendants' second request
for an extension of this deadline and is not presented for any dilatory or prejudicial purpose.

This Motion is based upon the attached points and authorities, the Declaration of Michael Hogue,
Esq., the pleadings and papers on file herein and any argument of counsel that may be considered at the
hearing on this Motion by the Court.

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DATED this 28th day of February, 2017.

WRIGHT, FINLAY & ZAK, LLP

/s/ YanXiong Li, Esq.

Dana Jonathon Nitz, Esq.

Nevada Bar No. 0050

YanXiong Li, Esq.

Nevada Bar No. 12807

7785 W. Sahara Avenue, Suite 200

Las Vegas, Nevada 89117

Attorneys for OCWEN FINANCIAL CORP.,

MORTGAGE ELECTRONIC

REGISTRATION SYSTEMS, INC.,

MERSCORP HOLDINGS INC.

POINTS AND AUTHORITIES

Plaintiff commenced this lawsuit on December 16, 2016, by filing his pro per Complaint (ECF No. 1). The Complaint spans 75 pages, asserts 16 causes of action, and includes 236 separate factual allegations that require individual response. The Complaint identifies as defendants: Ocwen Financial Corp. ("Ocwen"), Mortgage Electronic Registration Systems, Inc. ("MERS"), MERSCorp Holdings Inc. ("Merscorp"), among the 26 separate individual and entity defendants named. This Court previously granted Defendants an extension to respond to the Complaint up to and including March 1, 2017. Defendants have since retained new counsel to further their joint defense, and are working to complete the transition process. By this Motion, Defendants jointly request an extension of time to respond up to and including April 1, 2017. This request is being made pursuant to F.R.C.P. 6(b)(1)(A) as the time period to respond to the Complaint has not yet passed for any of the Defendants.

Good cause exists to extend the time to respond to the pro per Complaint because of the transition of defense to new counsel. The requested time is needed for new counsel to investigate the facts and analyze the applicable law in order to prepare a response. Moreover, multiple defendants will need to review and approve the substitution of attorney and response to Complaint before it can be filed. Defendants submit that the additional time requested is reasonable and not intended to cause undue delay or prejudice.

CONCLUSION

For these reasons, Defendants respectfully request an extension of the time to respond to Plaintiff's Complaint until April 1, 2017.

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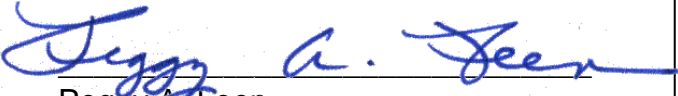
1 DATED this 28th day of February, 2017.

2 WRIGHT, FINLAY & ZAK, LLP

3 /s/ YanXiong Li, Esq.
4 Dana Jonathon Nitz, Esq.
5 Nevada Bar No. 0050
6 YanXiong Li, Esq.
7 Nevada Bar No. 12807
8 7785 W. Sahara Avenue, Suite 200
9 Las Vegas, Nevada 89117
10 *Attorneys for OCWEN FINANCIAL CORP.,*
11 *MORTGAGE ELECTRONIC REGISTRATION*
12 *SYSTEMS, INC., MERSCORP HOLDINGS INC.*

13 **IT IS ORDERED** that the Motion to Extend Time (ECF No. 39) is **GRANTED** and
14 Defendants Ocwen Financial Corp., Mortgage Electronic Registration Systems, Inc., and
15 Merscorp Holdings, Inc. shall have up to and including April 1, 2017, to file a responsive
16 pleading to Plaintiff's pro per complaint.

17 Dated: February 28, 2017

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19 Peggy A. Leen
20 United States Magistrate Judge
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I electronically served the foregoing **RENEWED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT** was made on the 28th day of February, 2017, to all parties and counsel as identified on the Court-generated Notice of Electronic Filing and/or by depositing a true and correct copy of the same in the U.S. Mail addressed as follows:

Salma Agha-Khan, M.D.
3751 Motor Ave., #34272
Las Angeles, CA 90034

/s/ Kelli Nikole Wightman
An Employee of WRIGHT, FINLAY & ZAK, LLP